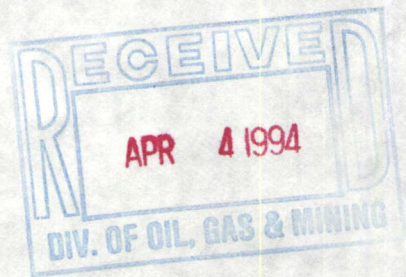


Moab District
San Rafael Resource Area
900 North 700 East
Price, Utah 84501



3809
(UTU-69862)
(UT-067)

Neal Mortensen
Western Clay Company
508 East Center
Aurora, Utah 84620

MAR 31 1994

Dear Mr. Mortensen:

We have received a copy of your plan of operations for the Last Chance Bentonite Mine from the Utah Division of Oil, Gas and Mining. We have reviewed the plan of operations and have found it to be incomplete. The following items need to be added, expanded upon, or changed:

1. The plan of operations was not signed nor was there an accompanying letter with a signature. An authorized officer for Western Clay Company needs to sign either the plan or an accompanying letter.
2. Topsoil stockpiles need to be shown separately from waste and/or overburden stockpiles on the map. The proposed location of the stockpiles should be shown in the expansion areas. All topsoil stockpiles should be signed as such.
3. A listing of the equipment and a detailed description of the operation should be included. Break the operation down into steps, describing each step such as topsoil removal, overburden removal, commodity extraction and so on.
4. A description of the mining sequence should be included along with the estimated life of the mine for this plan. A map should be included showing the mining sequence on a year-by-year basis. The reclamation sequence should also be included. Are you going to reclaim as you go? Or will everything be reclaimed at the end of the life of the mine? If the reclamation is sequential, a map showing the sequence of reclamation should be included in the plan.
5. Erosion-control measures need to be discussed. If the mine surface will be lower than the surrounding land surface, thereby preventing sediment loss, it should be pointed out in the plan.
6. Operating times should be included in the plan. The frequency and number of truck trips per day or per week should be included in the plan.
7. The size of the work force should be in the plan, as well as what type of work each worker will be doing.

8. The access road is not shown or mentioned in the plan. Any acreage for the access road, which goes from the county road to the mine, should be included in the plan in both the text and a map.

9. It would be advisable to incorporate the terms and conditions of your existing notice into your plan.

10. It is not clear if the final reclamation of knocking down the highwall is included in both the mine map and the acreage calculations. If it is not included, then it will have to be added to both the acreage calculations and the map. If it is not included, there could be problems with the possibility of disturbance of Pediocactus winkleri. If the total area of the disturbance is included in the plan, then the boundary of the mine disturbance should be delineated. Reclamation should also be described in the text in more detail.

The proposed site boundary was not very well flagged as of March 29, 1994. More flagging or stakes should be added and the corners should be clearly marked.

Sincerely,

/s/ NEIL A. SIMMONS

Area Manager

Acting

cc: Bryant Anderson
Emery County Planning and Zoning
P.O. Box 297
Castle Dale, Utah 84513
Kiran Bhayani
Utah Department of Environmental Health
Division of Water Quality
P.O. Box 16690
Salt Lake City, Utah 84116-0690
Wayne Hedberg
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